

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS,
EASTERN DIVISION

MATTHEW BAHR and)	
CHRISTINE LUCERO,)	
on behalf of themselves and a class,)	
)	
Plaintiff,)	Case No. 16 CV 6664
v.)	
)	Judge Joan H. Lefkow
THE GIRARD LAW GROUP, P.C.)	
)	
Defendants.)	

**DEFENDANT’S MOTION FOR EXTENSION OF TIME
TO FILE RESPONSE TO PLAINTIFFS’ COMPLAINT**

Defendant, The Girard Law Group, P.C. (“GLG”) by its attorneys, for its motion for an extension of time to file a response to the Plaintiffs, Matthew Bahr’s and Christine Lucero’s Class Action Complaint (“Complaint”), states as follows:

1. This case arises from a claim GLG alleging violations of the Fair Debt Collection Practices Act, 15 U.S.C. ¶1692 et seq.
2. On June 24, 2016, plaintiffs filed their Complaint.
3. GLG was served with Summons and a copy of the Complaint on July 6, 2016.
4. GLG’s counsel was recently retained to handle this matter on its behalf.
5. GLG’s’s counsel is yet to meet with its client to discuss this case in any sort of detail.
6. GLG’s counsel is yet to obtain and review the necessary file materials in the above-captioned case.
7. GLG’s counsel is out of the country on business and scheduled to return on August 1, 2016.

8. GLG requests to and including August 24, 2016, to file a response to plaintiffs' Complaint. This extension of time will not unduly delay the progress of this case to trial.

9. This motion is brought in good faith and without prejudice to any party.

WHEREFORE, Defendant, The Girard Law Group, P.C., respectfully requests entry of an Order granting it an extension of time to and including August 24, 2016, to file a response to the plaintiff's Complaint, and for any further relief the Court deems just and appropriate.

Respectfully submitted,

THE GIRARD LAW GROUP, P.C.

By: /s/ James J. Sipchen
One of its attorneys

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